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ATTORNEYS FOR DEFENDANT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

DEIDRE AGAN,

Plaintiff

vs.

BNSF RAILWAY CO., a
Delaware corporation,

Defendant

Cause No.: 1:19-cv-00083-SPW-TJC

**AFFIDAVIT OF STEVEN T.
WILLIAMS**

STATE OF Montana

:SS

County of Yellowstone


Steven T. Williams, being first duly sworn upon oath and over the age of
18 years, hereby deposes and states as follows:

- 1 1. Affiant is an attorney practicing law in Billings, Montana at Knight
2 Nicastro Mackay, LLC. Affiant represents BNSF Railway Co. in the
3 above-entitled matter.
4
- 5 2. **Exhibit A** to Defendant's Motion for a Protective Order and Brief in
6 Support is a true and accurate copy of Plaintiff's 30(b)(6) deposition
7 notice.
8
- 9 3. **Exhibit B** to Defendant's Motion for a Protective Order and Brief in
10 Support is a true and accurate copy of the earning history for the three
11 individuals above and below Plaintiff in seniority at BNSF. The employee
12 identification numbers have been redacted.
13
- 14 4. **Exhibit C** to Defendant's Motion for a Protective Order and Brief in
15 Support is a true and accurate copy of BNSF's discovery responses in this
16 matter.
17

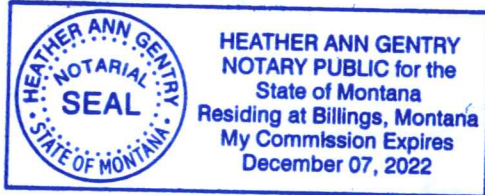
18 DATED this 24th day of August, 2020.
19

20
21 FURTHER AFFIANT SAYETH NAUGHT
22

23 KNIGHT NICASTRO MACKAY, LLC
24

25 By: 
26 Steven T. Williams
27 *Attorney for Defendant*
28

1 Subscribed and sworn to me this 24th day of August, 2020 by Steven T.
2 Williams.
3



By: [Signature]
Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on this 24 day of August, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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KNIGHT NICASTRO MACKAY, LLC

By: /s/ Steven T. Williams

Steven T. Williams

Anthony M. Nicastro

Attorneys for Defendant